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7 Attorney for Mauricio Martinez-Perez

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11
12 Plaintiff,
13
14 v.
15 MAURICIO MARTINEZ-PEREZ,
Defendant.

Case No. 2:21-cr-00104-JCM-EJY

**STIPULATION TO CONTINUE
REVOCATION HEARING**
(Second Request)

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, and Allison Reese, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Jacquelyn N.
20 Witt, Assistant Federal Public Defender, counsel for Mauricio Martinez-Perez, that the
21 Revocation Hearing currently scheduled on June 12, 2023, be vacated and continued to a date
22 and time convenient to the Court, but no sooner than thirty (30) days.

23 This Stipulation is entered into for the following reasons:

- 24 1. Defense counsel needs additional time to discuss this matter with Mr. Martinez-
25 Perez and conduct necessary investigation as to the allegations in the Petition.
26 2. The United States Probation Office has provided partial discovery in this matter,
and defense counsel is awaiting receipt of additional discovery. The requested continuance will

1 provide time for the United States Probation Office to provide outstanding discovery, and
2 additional time is necessary to allow defense counsel to review the same with Mr. Martinez-
3 Perez.

4 3. Mr. Martinez-Perez is in custody and agrees with the need to continue the
5 hearing.

6 4. The parties agree to the continuance.

7 This is the second request for a continuance of the revocation hearing.

8 DATED this 8th day of June, 2023.

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10 RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

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12 By /s/ Jacquelyn N. Witt

By /s/ Allison Reese

13 JACQUELYN N. WITT
14 Assistant Federal Public Defender

ALLISON REESE
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

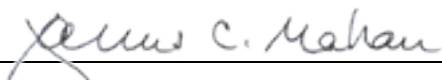
3 UNITED STATES OF AMERICA,
4 Plaintiff,
5 v.
6 MAURICIO MARTINEZ-PEREZ,
7 Defendant.
8

Case No. 2:21-cr-00104-JCM-EJY

ORDER

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10 IT IS THEREFORE ORDERED that the revocation hearing currently scheduled for
11 Monday, June 12, 2023 at 10:30 a.m., be vacated and continued to **July 19, 2023, at 10:30**
12 **a.m.**; or to a time and date convenient to the court.

13 DATED June 9, 2023.

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16 UNITED STATES DISTRICT JUDGE
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